

## REMARKS

The Applicants hereby submit a new set of amended claims which they assert are a proper response to the Notice of Improper Request for Continued Examination and the Notice of Non-Compliant Amendment. Copies of both of these notices are also enclosed herewith.

The Examiner has finally rejected claims 1-10, 12, 70-73 and 75-102 under Section 103(a) over World Patent Application No. WO 91/16409. In addition, the Examiner added a new grounds of rejection of the same claims under Section 103(a) over WO 85/02175 in spite of the fact that this reference had already been previously considered by the Examiner and in the office action of December 18, 2003, was stated by the Examiner to have been overcome by the response of November 24, 2003. These rejections are respectfully traversed.

The Applicants had previously argued that the present claims are not obvious over WO 91/16409 in the response to final rejection of July 29, 2005. Based upon information provided in the EniChem Technical Bulletin 2291 about LIAL detergent alcohols and the experimental results reported in the present application, the Applicants argued that the present claims were not obvious in view of the reference. In the most recent final rejection, the Examiner contends that it would have been obvious to optimize the branching of the specific alcohols and optimize the branching by utilizing wellknown natural feedstock. The Examiner contended that the Applicants have not shown each of the sulfated alcohols as claimed and have not established criticality against the prior art LIAL detergent alcohol products.

The Applicants hereby submit the enclosed Declaration Under Rule 132 of William Warren Schmidt to provide experimental evidence that the materials with the claimed amount of branching do in fact provide significant advantages over the prior art LIAL products and that this difference is surprising.

The Declarant states that a number of experiments were performed to determine the detergency of various commercial and experimental products. He uses the results of relevant experiments to compare the compositions of the present invention against commercial products such as LIAL detergent alcohols. The Declarant reports radio tracer multisebum detergency at 10°C which is a cold water temperature for laundry detergency. The Declarant describes the experiments as being carried out with NEODOL® 45 alcohol sulfates, a 20 percent branched

product, LIAL 145 detergent alcohol sulfates, a 60 percent branched product (an average number of branches per molecule of 0.6), and a separated branched fraction of NEODOL® 45 alcohol which contains an average number of branches per molecule of approximately 0.95 (approximately 95 percent branched).

The Declarant points out that the results of these experiments show that the detergency of the branched fraction of NEODOL® 45 alcohol is 34.5. The Declarant states that the huge jump in detergency from the LIAL products to the branched fraction (from 18.5 to 34.5) is surprising and nonobvious, especially when one compares the results achieved from going from a material with an average number of branches per molecule of 0.2 to the LIAL 145 product (from 15.8 to 18.5) which has an average number of branches of 0.6. The Declarant states that in his opinion this large increase is not obvious from the known prior art and that therefore he believes that, based on this data, the claims of the present application are not obvious over WO 91/16409.

As discussed above, the Examiner has also renewed the obviousness rejection based on WO 85/02175 in spite of the fact that this rejection was previously withdrawn (office action of December 18, 2003) and the arguments submitted opposing that rejection were stated to be persuasive. The Applicants herein renew their traversal of the rejection based on WO 85/02175 and herein incorporate all of the remarks made in the November 20, 2003 Response to Final Rejection.

For the reasons discussed above related to the experiments described in the experiments under Rule 132 and for the reasons given in the Response to Final Rejection of November 20, 2003, the Applicants assert that the rejections have been overcome and respectfully request an early notice of allowance.

Respectfully submitted,

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